



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: Great Southern Wood Preserving, Inc.

Facility Address: 2290 Plunkett Road NW
Conyers, Georgia 30012 (Rockdale County)

Mailing Address: 2290 Plunkett Road NW
Conyers, Georgia 30012

Facility AIRS Number: 04-13-247-00074

Construction and operation of a facility for treating kiln dried lumber with fire retardant and drying the treated lumber in a low temperature drying kiln, and for continued operation of existing pressure treating facility for Southern Yellow Pine Lumber.

This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28036 dated July 7, 2021 and updates of August 9, 2021; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages.



Richard E. Dunn, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not treat more than 65 million board feet (MMbf) of lumber through the batch drying kiln (ID No. BK1) in any continuous twelve months.
[Title V avoidance]
- 2.2 The Permittee shall not operate the batch drying kiln (ID No. BK1) at more than 180 °F.
[Title V avoidance]
- 2.3 The Permittee shall fire natural gas only in the batch drying kiln (ID No. BK1) burner.
[Georgia Air Toxics Guidelines; 391-3-1-.03(2)(c); and 391-3-1-.02(2)(g)2. (subsumed)]

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- 2.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from all process equipment, any gases which exhibit visible emissions, the opacity of which is equal to or greater than 40 percent, unless otherwise specified.

[391-3-1-.02(2)(b)1.]

- 2.5 The Permittee shall not cause, let, permit, suffer, or allow the rate of emissions from each manufacturing process particulate matter in total quantities equal to or exceeding the allowable rate calculated as follows:

[391-3-1-.02(2)(e)1(i)]

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour

$E = 55 P^{0.11} - 40$; for process input weight rate above 30 tons per hour

Where:

E = PM emission rate in pounds per hour

P = process input weight rate in tons per hour

- 2.6 Within 180 days of the initial startup of the batch drying kiln (ID No. BK1), the Permittee shall develop and implement a Site-Specific Kiln Emissions Management Plan (KEMP); identifying general work practice standards to minimize emissions. The program shall be subject to review and modification by the Division. All operational and maintenance checks shall be made, and a record of the findings and corrective actions taken, shall be kept in electronic or manual maintenance logs. With future equipment changes or modifications, the site-specific KEMP may be modified.

[391-3-1-.02(2)(tt)1.]

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions with any operation, process, handling, transportation, or storage facilities to prevent fugitive emissions of air contaminants. Opacity from fugitive emission source shall not equal or exceed 20%.

4. Process & Control Equipment

Not applicable.

5. Monitoring

- 5.1 The Permittee shall monitor and record the temperature inside the batch drying kiln (ID No. BK1) during its operation. Data shall be recorded hourly and three-hour averages determined.

[391-3-1-.02(6)(b)1.]

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6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.
 - c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines.
 - d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall submit written notification of startup of the fire retardant treating operation to the Division within 15 days after such date. The notification shall be submitted to:
Mr. Sean Taylor
Stationary Source Compliance Program
4244 International Parkway, Suite 120
Atlanta GA 30354
- 7.2 The Permittee shall maintain monthly records of the amount of treated lumber processed through the batch drying kiln (ID No. BK1). The records shall be retained in a permanent form suitable and available for inspection or submittal to the Division, upon request. These records shall be retained for at least five years following the day of record. The Permittee shall notify the Division in writing if the production through BK1 exceeds 5.4 MMbf during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 2.1.
[391-3-1-.02(6)(b)1.]

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- 7.3 The Permittee shall, each month, calculate and record the twelve-month rolling total of the board feet of lumber dried in the batch drying kiln (ID No. BK1), using the monthly records required in Condition 7.2. A twelve- month rolling total shall be defined as the sum of the current month's total plus the totals for the previous eleven consecutive months. The Permittee shall notify the Division in writing if any twelve-month total ending in a calendar month exceeds 65 MMbf. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the production limit in Condition 2.1.
[391-3-1-.02(6)(b)1.]
- 7.4 The Permittee shall promptly report any three-hour rolling average drying kiln temperature equal to or greater than 180 °F. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the drying kiln temperature limit in Condition 2.2.
[391-3-1-.02(6)(b)1.]

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."